

## Sydney Fish Market Submission

### ***Country of origin labelling for seafood in hospitality settings - information standard and explanatory statement:***

#### **Introduction:**

Sydney Fish Market (SFM) is an institution in the NSW and wider Australian fishing industries, providing a secure and reliable marketplace for Australian seafood since 1966.

SFM first operated as a wholesale fish market by the Fish Marketing Authority, a state-run body. In 1994, SFM's structure was significantly transformed when the New South Wales Government privatised the marketing of seafood, and Sydney Fish Market Pty Ltd was formed. Since 1994, SFM has been owned equally by the harvest and post-harvest sectors of the NSW seafood industry - the Catchers Trust of NSW and SFM Tenants and Merchants Pty Ltd.

SFM is the largest market of its kind in the southern hemisphere, with our auction trading over 100 different species of seafood each day. In the 2024 financial year, SFM traded more than 500 species of seafood with a total value of over \$163m.

In addition to our auction operations, we also manage a bustling site, featuring a cooking school, wholesale seafood traders, six seafood retailers as well as several other restaurants and cafes, each of which sells both local and imported seafood.

Sydney Fish Market is currently undergoing the biggest transformation in the company's history, with the relocation to our spectacular new premises in Blackwattle Bay set to occur in late 2025. The move to the new Sydney Fish Market will see an expanded retail and food service offering helping to cater to an anticipated doubling of site visitors.

The new Sydney Fish Market provides significant opportunities to showcase Australian seafood to a global audience in a highly competitive world market.

#### **Support for the Seafood Information Standard:**

As Australia's home of seafood and a cornerstone of the country's seafood industry, SFM has long advocated for extending mandated country of origin labelling (CoOL) of seafood to the food service sector.

We broadly support the Exposure Draft, and we commend the Australian Government for committing to working with the seafood and hospitality sectors to implement this initiative.

#### **Recommendations:**

**Section 5.2** (seafood harvested outside Australia only) - the proposed information requirements allow for some avoidance of disclosure of the country of origin and instead relying on consumer geographical awareness. For example, *Cloudy Bay Clams* would satisfy the requirement (section 5.2(c)), however this description relies on the consumer to know that Cloudy Bay is in New Zealand, and therefore this is an imported item.



We propose that if the written location of origin is used, it should be in addition to the country of origin and/or '(Imported)' as per the AIM model. E.g: *Cloudy Bay Clams (NZ)*, or *Cloudy Bay Clams (Imported)*.

**Section 5.3** - We have concerns about the potential for confusion around the interpretation of the word 'Mixed' in the AIM model. The terms 'Australian' and 'Imported' are easy to understand, however 'Mixed' could readily be mistaken on a menu as meaning mixed species instead of mixed origin – particularly if the consumer is not familiar with the AIM model. For example: *Seafood Marinara (Mixed)* and *Fishermen's Basket (Mixed)* both follow the proposed information standard but could be interpreted as containing a mix of seafood.

A proposed solution for this could be a requirement for menus to specify 'mixed origin' rather than simply stating 'mixed'.

### **Additional comments**

Although not referenced in the Exposure Draft, we wish to stress that the success of the Standard will rely on a well-resourced implementation plan including adequate support for the food service sector as well as a public information/awareness campaign.

Additionally, industry has not yet been advised as to the enforcement strategy. This must be given due consideration to ensure compliance and consistency across all jurisdictions.

We look forward to receiving more information about the implementation plan and enforcement strategy.

### **Conclusion**

Thank you for the opportunity to participate in this consultation process.

If any additional clarification is required, please do not hesitate to contact us.

SFM's previous submissions on this subject are available on our website:

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